

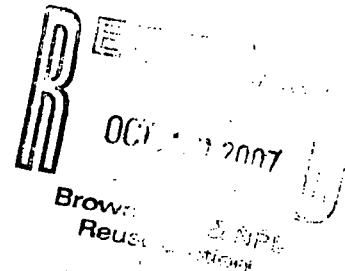


## City of Southfield

26000 Evergreen Rd. • P.O. Box 2055 • Southfield, MI 48037-2055 • [www.cityofsouthfield.com](http://www.cityofsouthfield.com)

October 11, 2007

Mr. Don West  
Environmental Management Support, Inc.  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910



Re: Application/Proposal  
\$200,000 USEPA Hazardous Substances Assessment Grant  
Southfield, Michigan

Dear Mr. West:

The City of Southfield is submitting the enclosed application for a Community-Wide Hazardous Substance Assessment Grant in the amount of \$200,000. This grant is needed to expand the City of Southfield's Brownfields Program to allow for funding of brownfield inventory and assessment activities.

The City of Southfield is a first tier, land-locked community located along the northeast boundary of the City of Detroit. What was once a suburb of Detroit, Southfield is itself now an urban core community facing the realities and problems associated with the industrial and economic decline associated with a shrinking automotive industry that has resulted in Michigan having the highest unemployment rate in the nation. Southfield has further suffered from an aging infrastructure and rapidly changing demographic, as large numbers of middle and high income households and professional class workers left the City, replaced by working class individuals.

Cognizant of the challenges of revitalizing the City, Southfield needs to create and support a strong brownfields redevelopment initiative to help mitigate further economic decline and foster economic redevelopment in the hardest hit areas of the City. Assessment Grant dollars will help level the playing field for redevelopment of Southfield's built-out environment. Greenfield communities, located on the outskirts of the metropolitan area, have large amounts of undeveloped land, which is less complicated and less expensive to develop than already-built properties. The ability to facilitate redevelopment projects quickly and efficiently and market these capabilities to developers will give Southfield an edge in the competition for limited development dollars.

A community-wide Assessment Grant will support brownfield redevelopment activities, which are key to Southfield's survival as an older, built-out community. Southfield intends to use Assessment Grant money to begin identifying and assessing the various larger abandoned industrial/manufacturing sites that are located throughout the City. Southfield intends to focus Assessment Grant funds on the southeast portion of the City, where many of the City's brownfield sites are located, disproportionately impacting the areas mostly African-American population.

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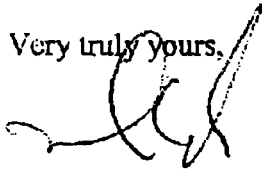
Kenson J. Siver

October 11, 2007

The following applicant information was requested as part of the Grant Application:

1. Applicant Identification: City of Southfield Brownfield Redevelopment Authority, 26000 Evergreen Road, P.O. Box 2055, Southfield, Michigan 48037, Ph. (248) 796-4161.
2. Funding Requested:
  - a. Grant type: Assessment
  - b. Amount: \$200,000
  - c. Contamination: Hazardous Substance
  - d. Community-wide
3. Location: City of Southfield, Oakland County, Michigan  
The Mayor of the City of Southfield is Mrs. Brenda Lawrence who may be contacted at 26000 Evergreen Road, P.O. Box 2055, Southfield, Michigan 48037. Ph. (248) 796-5100, Email: blawrence@cityofsouthfield.com.
4. Contacts: The Project Manager is Mrs. Rochelle Freeman, Business Development Manager, who may be contacted at 26000 Evergreen Road, P.O. Box 2055, Southfield, Michigan 48037. Ph. (248) 796-4161, Email: rfreeman@cityofsouthfield.com.  
Mr. Ed Powers, Chairman of the Brownfield Redevelopment Authority, is responsible for the project proposal. Mr. Powers may be contacted at 26000 Evergreen Road, P.O. Box 2055, Southfield, Michigan 48037. Ph. (248) 557-6661, Email: southfeldchamber@yahoo.com.
5. Date Submitted: October 11, 2007
6. Project Period: Three (3) years
7. Population: 78,059
8. Other: None applicable
9. Cooperative Partners: Cornerstone Development Authority, Mr. Frank Brock, Executive Director, who may be contacted at 15600 J.L. Hudson Drive, Suite C, Southfield, Michigan 48075. Ph. (248) 796-5190, Email: CDAinfo@cityofsouthfield.com.

Very truly yours,



Nicholas G. Banda  
Director of Planning & Economic Development  
City of Southfield, Michigan

Distribution: Ms. Deborah Orr, EPA Region 5 (1 pc)



**PROPOSAL FOR FY2008 EPA HAZARDOUS SUBSTANCE ASSESSMENT GRANT  
CITY OF SOUTHFIELD, MICHIGAN**

**Threshold Criteria for Assessment Grants**

**A. Applicant Eligibility**

The City of Southfield Brownfield Redevelopment Authority (SBRA) is a Michigan municipal corporation, a general purpose unit of local government in the State of Michigan.

**B. Letter from State Environmental Authority**

See Attachment A.

**C. Site Eligibility and Property Ownership Eligibility**

The applicant is requesting a community-wide assessment grant; therefore, site eligibility and property ownership eligibility criteria do not apply.

**Ranking Criteria for Assessment Grants**

**A. Assessment Grant Proposal Budget**

The Assessment Grant budget is summarized in the table below.

<b>Budget Categories</b>	<b>Task 1 Programmatic Costs</b>	<b>Task 2 Community Outreach</b>	<b>Task 3 Site Inventory</b>	<b>Task 4 Site Assessment</b>	<b>Task 5 Cleanup Planning</b>	<b>Total</b>
Personnel	\$7,000	\$3,000	\$5,000			<b>\$15,000</b>
Fringe Benefits						
Travel	\$3,600	\$100				<b>\$3,700</b>
Equipment	\$1,000					<b>\$1,000</b>
Supplies		\$150	\$150			<b>\$300</b>
Contractual		\$2,000	\$10,000	\$162,000	\$5,000	<b>\$179,000</b>
Other (Legal)				\$1,000		<b>\$1,000</b>
<b>Total Grant Budget</b>	<b>\$11,600</b>	<b>\$5,250</b>	<b>\$15,150</b>	<b>\$163,000</b>	<b>\$5,000</b>	<b>\$200,000</b>

**Task 1: Programmatic Costs**

The Assessment Grant proposal budget includes projected programmatic costs of \$11,600. These will include personnel costs (\$7,000) associated with setting up and conducting operational meetings, expanding the City's existing City-wide Geographic Information System (GIS) database, and travel to three USEPA Brownfields Conferences (\$1,200 per trip). The SBRA plans to purchase a desktop computer (\$1,000) that will be dedicated to managing the brownfield program and updating the GIS database with brownfields inventory information.



The programmatic task for developing a brownfields GIS database can be accomplished cost-effectively because Southfield has already developed a GIS system. Developing the brownfields component for the GIS system will involve adding an overlay and developing a database of appropriate information.

### **Task 2: Community Outreach**

The City anticipates community outreach costs of approximately \$5,250. These costs will include personnel and contractual costs of \$3,000 and \$2,000, respectively, for coordinating and conducting community involvement and outreach programs and meetings, travel to community outreach events (\$100) for mileage to and from meetings and events, and costs of preparing, printing, and mailing project and site information and marketing pamphlets, documents, etc. (\$150). The City will also provide in-kind additional staff resources, estimated to be \$3,000 to \$5,000, needed to conduct environmental outreach meetings, draft press releases, update the City's website as new information is generated, and other activities to complete the community outreach programs.

### **Task 3: Site Inventory and Selection**

The City anticipates site inventory development costs of approximately \$15,150. These costs will include City personnel costs of \$5,000 and travel costs of \$150 for identifying and cataloging sites, collecting, evaluating, and entering into the GIS database the pertinent available site information, and developing and implementing a site prioritization scheme. These activities will be supported by the retained environmental consultant at an estimated cost of \$10,000.

### **Task 4: Site Assessment**

Site assessment contractual costs of approximately \$163,000 are anticipated. These costs are based on conducting approximately eight Phase I ESAs at an average cost of \$3,000 each, six Phase II ESAs at an average cost of \$20,000 each, and four Michigan VCP program documents at an average cost of \$4,500 each. Approximately \$1,000 for legal counsel support (e.g. arranging site access agreements for privately owned sites) is also included in this task.

### **Task 5: Cleanup Planning**

The City will conduct cleanup and redevelopment planning as needed for brownfield sites where redevelopment is imminent and such activities will facilitate the redevelopment. Where exacerbation of contamination may be an issue during redevelopment and future use, a VCP "Due Care" obligation to protect human health is placed on all owners of contaminated sites in Michigan. Contractual costs for this task are estimated at \$5,000.

## **B. Community Need**

**B.1.** Challenged by deteriorating infrastructure, previously developed land, an increasingly diverse population, and a growing concentration of poverty, the City of Southfield, Michigan, faces a unique set of challenges that puts them in a category of their own. Because of Southfield's location near Detroit's urban core, the City was among the first suburbs to develop and is now among the oldest in the metropolitan region. The City of Southfield is a land-locked community located along the northeast boundary of the City of Detroit. Founded in 1823, Southfield is a City bustling with people from a rich array of cultural, racial, ethnic and religious backgrounds. Once a suburb of Detroit, Southfield is itself now an urban core community facing the realities and problems associated with the industrial and economic decline coupled with a shrinking automotive industry, a decline being faced by all of southeast Michigan and the state as a whole.

As a first-tier suburb of the City of Detroit, Southfield historically enjoyed economic prosperity due to its close proximity to Detroit's manufacturing jobs base, well-established infrastructure, and strong neighborhoods. In the 1960s and 1970s Southfield experienced significant economic job growth and new



development, capitalizing on the successes of the U.S. automotive industry. Despite these early advantages, Southfield has experienced consistent economic decline since the 1970s.

Southfield has seen its professional class population decline as the general population and business centers migrated further from the urban core of Detroit, into the greenfields of the other metropolitan Detroit suburban communities. Michigan's declining manufacturing economy exacerbated this impact on Southfield, most notably with the 2001 bankruptcy of Federal-Mogul and drastic job cuts at Lear Corporation and other major automotive suppliers located in Southfield. Southfield has further suffered from an aging infrastructure and rapidly changing demographic, as large numbers of middle and high income households and professional class workers left the City, replaced by working-class individuals, most of whom are African-Americans, who migrated across 8 Mile Road, the boundary between Detroit and Southfield, into the southern part of the City. The southern part of the city has been most impacted by the loss of manufacturing and support industries and the associated plant closures and resulting creation of brownfields.

U.S. census data has shown a steady decline in Southfield's economy over the last 15 years. The 1990 U.S. Census reported 5.8% of Southfield's population with incomes below the poverty line. As of the 2000 U.S. Census, Southfield's population with incomes below the poverty line increased to 7.4%. The 2005 U.S. Census Bureau's American Community Survey reported approximately 8.9% of Southfield's population with incomes below the poverty line, an increase in the poverty level of 53% in less than 15 years. Additionally the per capita income for individuals in Southfield decreased approximately 33% between 1990 and 2000 and decreased another 2.8% between 2000 and 2005. Southfield's economic decline was coupled with a 4% drop in population between 2000 and 2005. Southfield's unemployment rate has steadily increased along with that of the state of Michigan, which now has the highest unemployment rate in the nation.

The 2000 census counted 78,296 people residing in Southfield. The racial makeup of the City was reported to be 54% African-American in 2000. The African-American population was reported to be 66% in the 2006 U.S. Census Bureau's American Community Survey. Nearly 80% of the population living in the southeast portion of the City is African-American; in areas dominated by Southfield's hardest hit industrial businesses and vacant commercial properties. Many of Southfield's brownfields are located in the southeast portion of the City, disproportionately impacting the area encompassing much of Southfield's poorest, mostly African-American, population.

Southfield has recognized the challenges of revitalizing the southeast side of the City, an area hard hit by loss of jobs, abandoned industrial facilities, a concentration of brownfields, and an influx of a lower income, minority population from Detroit. In 1988, Southfield established The Cornerstone Development Authority, a downtown development authority (DDA) under state statute (1975 PA 197), to reverse the trend of declining property values and conditions in southeastern Southfield. The Cornerstone Development Authority's mission is to enhance the local environment of southeast Southfield by making the area one in which people feel comfortable and secure as a place to live, work, shop, learn and be entertained and to strengthen the economic vitality and physical appearance. In the State of Michigan, a DDA has the ability to correct and prevent deterioration in the business district; to encourage historic preservation; to authorize the acquisition and disposal of interests in real and personal property; to authorize the creation and implementation of development plans in the district; to promote the economic growth of the districts; to authorize the levy and collection of taxes; and to authorize the issuance of bonds and the use of tax increment financing. The Cornerstone Development Authority is active in acquiring properties with a negative impact on the community. The Cornerstone Development Authority arranges to clear sites and works with developers to establish new, quality projects to strengthen the local economy. The Cornerstone Development Authority has undertaken several renovation projects and also assists in redevelopment and renovation projects undertaken by other parties, to help ensure their success.

Southfield is also a member of the 8 Mile Boulevard Association (8MBA). Founded in 1993, 8MBA promotes the 8 Mile Road transportation, business, and residential corridor between Detroit and its suburbs. 8MBA planted and maintains 27 perennial gardens along the corridor; coordinates annual week-long "Clean Team Campaigns"; improved more than 200 bus stops; and presents annual beautification awards to businesses along 8 Mile Road.

Southfield now needs funding to address the brownfield side of redevelopment, not covered by the DDA's activities. Budgetary deficits at the state level have resulted in cuts to revenue sharing programs for municipalities. Additionally, decreasing property tax revenues have left the City with less revenue, increasing expenses, and no funds to address brownfields.

**B.2.** The City of Southfield's location, extensive business community and varied demographic composition uniquely positions the City to exert a positive influence on the revitalization, future growth and development of metropolitan Detroit. Cognizant of its need to retain people to prevent urban sprawl, Southfield needs to create and support a strong brownfield redevelopment initiative to help mitigate further economic decline and foster economic redevelopment in the hardest hit areas of the City. However, because of the population changes, industrial decline, and state-wide tax revenue short-falls over the past two decades, Southfield currently lacks the tax base and revenue to build and support an effective brownfields "infrastructure" and conduct inventory, assessment, and clean-up planning to stimulate brownfields redevelopment in the City. A community-wide Assessment Grant will allow Southfield to support these activities; begin positive efforts to reverse the economic decline in the southeastern part of the City and mitigate the disproportionate impacts of brownfields on its African-American population; increase economic equality; and help restore economic vitality, jobs, and tax base to the City as a whole.

A community-wide Assessment Grant will support brownfield redevelopment activities, which is key to Southfield's survival as an older, developed community. Assessment Grant dollars will help level the playing field for redevelopment of Southfield's built-out environment. Greenfield communities, located on the outskirts of the metropolitan area, have large amounts of undeveloped land, which is less complicated and less expensive to develop than previously developed properties. The ability to facilitate redevelopment projects quickly and efficiently and market these capabilities to developers will give Southfield an edge in the competition for limited development dollars. At present, there are no local or state funds available for the initial environmental assessment activities needed to support developers' due diligence and site planning activities, assemble smaller parcels into attractive redevelopment sites, and encourage redevelopment of brownfields. State and County brownfield redevelopment funds are available only for specific sites already sufficiently assessed and demonstrated to be contaminated. Local brownfield support money is only available through the tax increment financing (TIF) program associated with the Michigan Brownfields Redevelopment Act (Act 381 of 1996, as amended), and only as a cost reimbursement after properties have been redeveloped. As with other local and state brownfields incentives, sites must first be assessed and shown to be contaminated before they are eligible for TIF reimbursement. Economic conditions and a declining tax base in Southfield rule out the use of general tax revenues for brownfields programs.

Southfield intends to use Assessment Grant money to begin identifying and assessing the various larger abandoned industrial/manufacturing sites that are located throughout the City, with a focus on the southeastern portion of the city, where the low-income, minority population is concentrated. The City also plans to use grant funds to perform due diligence activities to support the reuse of numerous smaller, potentially impacted parcels occupied by chemical-intensive operations, dry cleaners, printing shops, automotive repair facilities, and paint shops. Pre-acquisition assessment of these smaller, light industrial/commercial parcels will support both redevelopment/reuse of individual properties and amalgamation of smaller parcels to create larger, more attractive parcels suitable for future redevelopment.

Southfield intends to focus Assessment Grant funds on the southeast portion of the City, where many of the City's brownfield sites are located in the highly visible and now notorious section of the City, along 8 Mile Road, made infamous by the 2002 urban drama, *8 Mile*, starring Eminem and Brittany Murphy. Assessment Grant dollars will be used to support the City's DDA efforts in this portion of the City by bringing funding to the brownfield side of their revitalization efforts. Assessment Grant funds used in redevelopment of sites along 8 Mile Road will drastically improve the disproportional impact of brownfields on the mainly African-American population of this area in particular, and improve the City's image as a livable, prospering community in general. Redevelopment of these sites will also trigger other investment in the community as developers are encouraged by the improvements.

Southfield's focus along the 8 Mile Road corridor also corresponds with the goal of another significant economic development organization, the 8 Mile Boulevard Association (8MBA). Southfield is a founding member of the 8MBA, which was established in 1993 to revitalize and promote the 8 Mile Road transportation, business, and residential corridor by linking the efforts of the public and private sectors. Assessment Grant funds used in redevelopment of sites along 8 Mile Road will dovetail with investments triggered by 8MBA's activities. This will have a multiplying effect as brownfield dollars become an economic redevelopment tool for the City as well as 8MBA.

The obvious benefits of a community-wide Assessment Grant will include: reducing threats to human health and the environment; improving the living environment and property values/equity in low-income and minority areas of the City; improving the appearance and appeal of the community overall; creating jobs for a desperate work force; and restoring properties to productive, tax-generating uses. Southfield's position as a first-tier Detroit suburb amplifies the benefits from brownfield redevelopment. Assessment Grant monies will support cleanup of historical contamination from former commercial and industrial properties left vacant by years of a declining economy and continual suburban sprawl. Use of Assessment Grant monies for brownfield redevelopment will help return businesses and jobs to the community, reducing further sprawl into greenfield communities by drawing back industrial and commercial developments into an area which has the established infrastructure and trained population to support such use; and mitigate disproportional impacts of brownfields in the mostly minority-populated southeastern portion of the City. The increase in jobs and productive, tax-generating property use will result in increased revenues and improved financial capabilities for Southfield, which will further support the brownfields program.

**B.3.** The City of Southfield has experienced consistent economic decline since the 1970s. Many businesses, especially manufacturing, in the Southfield community were forced to close, leaving buildings abandoned and properties neglected. Many of the previously abandoned properties remain in disrepair, often contaminated, and off the tax records. These underutilized and neglected properties (often small in size, but large in number, in key redevelopment areas) and sites with environmental contamination impede reuse and impact residential neighborhoods. Former manufacturing buildings are eyesores, public nuisances and are factors inhibiting Southfield's ability to survive in a declining Michigan economy. In addition, these abandoned properties occupy valuable land that could be reoccupied by commercial or industrial businesses, market rate housing, and affordable housing that may otherwise develop greenspace in more rural areas and increase the already significant urban sprawl in southeastern Michigan.. Numerous large brownfields, occupying hundreds of acres of the City, have been preliminarily identified as potential targets for assessment activities using Assessment Grant funds. Some of the key targets include the following:

- Detroit Forming,
- Clawson Concrete,
- Wisne Office site,
- Gorman Furniture,
- Ross Transport,
- CMI International,
- Former Southfield trailer park, and
- Numerous properties within industrial areas and gas stations.

These abandoned and deteriorating commercial and industrial facilities create a variety of community concerns, such as loss of jobs and tax revenue; uncontrolled environmental contamination; deteriorating and unsafe buildings near residential neighborhoods, and negative community and neighborhood image. Several of the larger brownfield sites present significant environmental, health and safety impacts and lay in close proximity to Southfield's African-American residential neighborhoods. Most of the standing buildings present a safety threat because of their dilapidated condition and, as an added nuisance, an attractive place to hide illegal activities. Many of these buildings likely contain asbestos materials and lead-based paints and/or

were abandoned without adequate removal of oils or other hazardous materials that could pose health threats to the surrounding population.

Many of Southfield's brownfields consist of smaller parcels previously occupied by commercial and industrial operations that relied on significant hazardous substance use. Most of these sites are localized on the southeast side of the City, where Southfield's economic decline has been felt the hardest. These properties are difficult to redevelop by themselves because of competing greenfield sites in surrounding, more rural communities, their location in Southfield's economically depressed areas, and their small size. One of Southfield's Assessment Grant goals will be to assess these smaller brownfields to facilitate reuse individually or reuse by combining the smaller brownfield sites with other nearby properties, whether brownfield or not, and creating larger, assembled parcels that are more attractive for development. Assessment of and subsequent removal and redevelopment of the abandoned manufacturing sites and buildings located in the southeastern portion of the City will reduce the disproportionate share of the negative environmental consequences experienced by the largely African-American community.

### **C. Site Selection Process**

**C.1.** The SBRA plans to use Assessment Grant funds to expand the current anecdotal list of brownfields into a comprehensive, City-wide brownfields inventory as the first step in building a community brownfields redevelopment infrastructure. This will involve identifying current and former manufacturing sites and locating additional potential sites through searches of available databases (Michigan Part 201 Contaminated Sites, etc.), reviewing city directories and municipal records, requesting information from the Oakland County Health Department regarding sites or health concerns within the community, soliciting community nominations, and ground surveys.

Local groups, such as neighborhood associations, parent-teacher organizations, and business groups, will be invited and encouraged to nominate sites for inclusion in the inventory (see G.1. below). The City will hold public meetings to inform citizens of the process, solicit input from residents regarding their knowledge of local brownfields, and encourage its citizens to voice their concerns over real or perceived health threats associated with these brownfields. Community nominations will be supplemented with ground surveys to identify potential brownfields throughout the City. The ground surveys will be conducted by City and/or environmental professionals using identification criteria developed at the beginning of the grant project.

Southfield will collect historical, site use, site characterization and site assessment data for each potential site and enter the information into the City's GIS database, as it is developed for the brownfields program. The site selection process will likely proceed in a two-step manner, with initial screenings used to develop a first tier of priority sites in an efficient and timely manner, followed by collection of more detailed information as needed to support final site selection. The following criteria are anticipated to be the foundation of the site selection process: 1) known or suspected contamination and related threats to human health and the environment, 2) development potential, 3) level of potential environmental risks, 4) community impact and need, 5) overall site desirability and redevelopment feasibility (environmental conditions, constructability issues, building condition, etc.), 6) current and projected market value, 7) availability and reliability of information from previous environmental investigations, 8) status of title, 9) site accessibility, and 10) the ability of local units of government to address the site. These criteria and related data will be incorporated into the Brownfields GIS overlay. Sites nominated for selection will be compared to the U.S. EPA eligibility criteria to determine their eligibility status for funding under the statute (i.e. site ownership, potentially responsible party (PRP), etc.). Eligibility determinations will be prepared and submitted to the EPA for approval prior to expenditure of assessment funds.

**C.2.** Because of the City's declining economy, shrinking commercial and manufacturing base, and dwindling population, Southfield has not had the resources to conduct comprehensive, coordinated brownfields inventories, or the resources to support the City's DDA in their revitalization efforts. However, the City administration has recognized that the presence and impact of brownfields within the City are negatively affecting its citizens and impeding revitalization and economic redevelopment. Additionally,





these impacts have disproportionately impacted the African-American population and created environmental justice issues in the southeast portion of the City.

The City has taken steps to encourage redevelopment of brownfields including the establishment of a BRA to facilitate tax increment financing of environmental response costs needed to prepare brownfields in the City for redevelopment and the establishment of a DDA to focus revitalization efforts in the economically depressed southeast portion of the City. Now Southfield is seeking a Brownfields Assessment Grant to fund the activities that will strengthen its “brownfields infrastructure,” develop a comprehensive brownfields inventory, and proactively assess selected sites to help protect the community, raise developer awareness and interest, and encourage/support redevelopment, all of which will move its brownfields program forward.

The SBRA has already identified numerous potential brownfield sites for Assessment Grant funding (see Section B.3. above). These sites were identified as being located in southeast Southfield, along 8 Mile Road, or having imminent sale and redevelopment potential. These sites were identified as initial priorities based on anecdotal evidence and requests from Southfield’s business community for brownfield redevelopment assistance. No other information was considered in developing the initial list of sites and the list is outdated. A current comprehensive brownfields inventory is essential to support Southfield’s brownfields redevelopment programs and initiatives.

**C.3.** The use of Assessment Grant funds to assess privately owned sites will require either a site access agreement or acquisition of the property. Assessment of private property will likely occur under one of the following four scenarios: 1) the owner and/or prospective purchaser requests financial assistance to support the due diligence and liability management components of a specific property transaction prior to redevelopment, wherein access is readily provided, or 2) the owner, prospective purchaser, or new, non-liable owner/developer requests assistance in characterizing the nature and extent of contamination to support cleanup and redevelopment, 3) the owner agrees, or can be convinced, to conduct the assessment to help prepare the property for redevelopment or sale, or 4) the current owner refuses to cooperate and provide access. In the first three scenarios, voluntary access will be provided, often through a formal access agreement.

In cases where the City prioritizes a particular property for assessment, even a recalcitrant owner often can be convinced to allow such a third party assessment on his/her property. Commonly, these owners feel that the absence of information about environmental conditions is in their best interest. However, because the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Michigan environmental law allow a new owner to acquire and redevelop contaminated property without liability for the existing contamination, owners of impacted property can often be convinced that it is in their best economic interest to characterize a brownfield to facilitate transfer to a new owner.

In cases where the City identifies the assessment and redevelopment of a brownfield as a priority, the City may seek to acquire the site. In these cases, the City may decide to acquire the site directly, have it acquired by the SBRA, CDA, or an Economic Development Corporation (EDC), or establish a separate municipal non-profit corporation, as provided by Michigan law, to acquire and hold title to the property during the assessment and subsequent preparation and marketing for redevelopment.

#### **D. Sustainable Reuse of Brownfields**

For the last 20 years, metropolitan Detroit’s population and economy have been expanding away from Detroit’s urban core. As a result, valuable suburban and rural greenspace is being consumed by industry, commercial and retail businesses, and new residential developments. The metropolitan area’s infrastructure is being stretched to its limit and the urban core of the first-tier suburban communities are experiencing population loss and economic decline. Southfield is conscious of its role in preventing sprawl into outlying communities by becoming attractive to residents and businesses. As a first-tier Detroit suburb, Southfield has the established infrastructure and central location to Detroit’s job center to exert a positive influence on greenspace preservation in metropolitan Detroit and southeastern Michigan. Brownfield redevelopment in Southfield, with associated economic and community revitalization, can help stem the consumption of

greenspace (sprawl) by providing homes, jobs, and business opportunities within a developed urban core with established infrastructure.

**D.1.** Southfield believes that brownfields redevelopment should be sustainable so that redevelopment and associated growth are viable and maintainable over the long term, occur within current limits of the environment, do not cause detrimental impact on future generations, mitigate existing environmental and ecological risks, preserve resources for inter-generational continuity, enhance the economic and social structure of the community, and provide needed housing, services, facilities and amenities.

All of Southfield's brownfields are served by infrastructure (roads, rail, utilities, etc.) sufficient to support their redevelopment and reuse without significant additional resource investment. Many of the vacant commercial/retail buildings are structurally sound and only require remodeling and updating to be ready for productive reuse. The Assessment Grant will help the City provide redevelopment support, augmented by tax increment financing through the SBRA, to help focus development attention to, and induce reuse of, the existing resources of brownfields.

Southfield will encourage brownfield site cleanup and redevelopment plans to include on-site management of impacted soil to provide protection for human health and the environment, minimize resource use, make projects economically viable, and minimize off-site disposal and use of landfill capacity. In addition, Southfield will encourage maximum reclamation/recycling of materials removed from sites during demolition activities and site cleanups.

The City encourages adaptive reuse of as many buildings and as much infrastructure as possible through education campaigns for developers and through its site plan review and approval process. This process is also used to encourage sustainable reuse, total storm water management and greenspace preservation, particularly at sites on the Rouge River, energy efficiency through the Leadership in Energy and Environmental Design (LEED) program, and recycling/reuse programs. Where public funds, such as those from the Assessment Grant, are used to support brownfields redevelopment, the City will have additional leverage to require/encourage the inclusion of sustainability, energy efficiency, and greenspace preservation design components through the site planning and site plan approval process.

**D.2.** Brownfield redevelopment promoted by the use of Assessment Grant funds will have a significant positive economic impact on the City of Southfield and its citizens, especially if the large abandoned manufacturing facilities and other brownfields in the southeastern portion of the City are successfully redeveloped. Removal and redevelopment of the abandoned manufacturing sites and buildings located in the southeastern portion of the City will reduce the disproportionate impact on home values in the primarily African-American-populated area and improve the livability of the area. The City has proposed mixed commercial/residential redevelopment at most of these sites, with a goal of creating additional affordable housing with easy access to commercial and retail amenities.

One of the goals for Assessment Grant funded activities is to stimulate consolidation of numerous small adjoining potential brownfields (e.g. car repair shops, dry cleaners, small manufacturing sites, etc.) in southeastern Southfield into larger parcels that will be more attractive to redevelopment. The fear of contamination on these sites, and the resulting costs of due diligence for property assembly, currently inhibit redevelopment. Redevelopment of these properties, and other larger brownfields, will provide years of construction employment and will provide jobs and living space for the large minority population and help support an increase of home equity asset values in the area. The new developments will result in a significant increase in the City's tax revenue from property that now provides little or no tax revenue.

Redevelopment of the brownfield sites will increase values of nearby properties, as well as within the City as a whole. Property value appreciation in the southeast part of Southfield has lagged the rest of the City because of the presence of abandoned properties. This has disproportionately impeded the minority community's ability to build equity asset value in homes and improve economic equity with respect to the rest of the City and southeast Michigan. Removal of the industrial eyesores and addition of greenways and parks will significantly improve the image and livability of Southfield. Both redevelopment of the brownfields and improvement of community image will stimulate job growth, improve the tax base, and attract new residents and visitors. Increased housing and retail options are expected to improve living



conditions in the struggling southeastern, minority area of the City and attract service and retail development, revitalizing the targeted corridors and further improving the tax base.

**D.3.** The goal for redevelopment of the southeast part of Southfield is to create an area containing mixed residential, commercial and industrial uses, connected to other portions of Southfield via greenways and a mix of transportation modes. Viable developments in southeast Southfield will promote community growth, enhance existing community appeal, improve the availability of services and products, and restore economic equality among the citizens of Southfield by providing affordable housing and an economic boost to the area.

As a member of the United States Green Building Council (USGBC) and Michigan Green Industries Association, the City of Southfield has a long history of supporting “smart growth” and protecting the environment. Southfield is also a Tree City USA, maintaining over 780 acres of park land, spread over 20 parks. Southfield’s City Ordinance 1324 established a requirement on future development to protect, preserve, and maintain trees and woodlands within the City. The City also provides trees to Southfield residents at cost, in addition to continual plantings along public right of ways.

Part of the City’s brownfield redevelopment plan is to incorporate conservation development practices and preserve natural resources from development impacts. Southfield has the ability to stimulate sustainable development through the City’s current zoning ordinance which incorporates sustainable design requirements. Southfield will require future developments to incorporate greenspace into the site plan and consider site topography, soils, vegetation, natural drainage patterns, and other sensitive or unique landscape features. The City will encourage and support development to include links to parks and greenspaces with no interference to access. As a Rouge River Watershed community, Southfield strongly supports developments that integrate storm water Best Management Practices (BMPs) to protect and restore natural hydrology, prevent flooding, and protect habitat and water quality.

As described in D.1. and D.2., Southfield is working with citizens groups and businesses to promote vibrant, balanced communities with rural character. A goal of the City is to promote the redevelopment of brownfield sites as well as expand and improve greenspace in the communities. Removal and redevelopment of the abandoned manufacturing sites and buildings located in the southeastern portion of the City will reduce the disproportionate share of the negative environmental consequences experienced by the largely African-American community.

#### **E. Creation and/or Preservation of Greenspace/Open Space or Other Nonprofit Purpose**

Southfield has a long history of creating and preserving parks and greenspace for its citizens. The City has over 20 community parks and nature areas totaling 780 acres of greenspace, and over 30 miles of cycling, hiking and nature trails. These areas, important for a landlocked, urban community, are distributed across the City to provide easy public access and foster community interactions. Southfield’s Parks and Recreation Department maintains the City’s greenspaces, nature areas and trails system to provide safe, educationally challenging, convenient leisure opportunities, utilizing public open space and quality leisure facilities to enhance the quality of life for Southfield’s population.

As a land locked, first-tier suburban community with a well-established parks and trails system, Southfield has met its Master Plan goals for greenspace and parks within the community. As such, Southfield’s brownfields redevelopment program is not designed to create or preserve specific park land or greenspace. While not actively proposing greenspace creation on a wholesale basis within the City, Southfield fully intends to require localized greenspace creation for specific brownfield redevelopments through the use of PUD zoning. The City will, however, require brownfield redevelopments supported with public funds are designed to provide and/or not inhibit access to and between existing parks.

From a regional greenspace perspective, brownfields reuse in Southfield will serve to provide jobs and homes within a developed community, thus serving to reduce sprawl pressure on outlying agricultural and lesser-developed townships and communities. Detroit’s outer suburbs are consuming greenspace at a pace six to eight times more quickly than population growth, faster than almost any other major American metropolitan region. This uncontrolled and unprecedented sprawl is destroying irreplaceable wetlands, agricultural land, and natural areas. Brownfields redevelopment in Southfield will help preserve remaining



greenspace in surrounding communities by redirecting development to abandoned and underutilized commercial and industrial property, thereby providing developers with real estate that is suited for residential, commercial and industrial use, serviced by existing infrastructure, and located closer to Detroit's economic center. Furthermore, Southfield's efforts to preserve greenspace through use of the Assessment Grant will allow for additional cooperation between Southfield and the 8MBA. 8MBA already works with Southfield and 12 other communities along 8 Mile Road by planting and maintaining perennial gardens along the corridor. 8MBA will serve as Southfield's long term greenspace manager along the 8 Mile Road corridor.

## **F. Pre-Award Community Notification**

**F.1.** The City of Southfield is a culturally and economically diverse community. The success of the City's brownfields redevelopment goals depends on strong community involvement and support. Accordingly, the City feels it is important to provide its citizens and community organizations ample opportunity to become informed, review documents and plans, and provide input into all phases of the Assessment Grant project. The City will include the public and community organizations in all phases of the brownfields redevelopment process.

Following notice of an Assessment Grant award by the U.S. EPA, the City will announce the award to the community through a press release from the SBRA to the local newspaper (Observer Eccentric), notice on the City's website, advertisements on local radio stations and local access cable television (CATV), and distribution of "E-news" via the City's email publication system. The SBRA will also hold a public meeting to discuss the grant and the City's brownfield program. The SBRA will contact each of Southfield's 94 neighborhood organizations and 39 condominium associations via the Southfield Neighborhood and Information Center (NIC) to reach the local community and other interested parties. The NIC is a community outreach structure unique to the City of Southfield in southeast Michigan (see section G.1. below). Its purpose is to maintain an active list of citizen organizations in the City and facilitate two-way communications with those groups. The NIC program will be used extensively throughout the Assessment Grant project.

The primary post-award community input program will be focused on preparation of the grant Work Plan and final budget. After SBRA prepares a draft Work Plan and budget, it will be made available to the public and community organizations, and comments on the draft will be solicited. The document will be posted on the City's website, and hard copies will be made available at the City's Business Development office to ensure access for those without appropriate information technology availability, knowledge, or experience. The document availability and solicitation of comments will be announced to the public via the City web site, local CATV channel, newspaper notice, notification of community groups through the NIC, and notification of business groups through the DDA and Chamber of Commerce. Public comments will be accepted verbally, in writing, and publicly discussed during an SBRA board meeting. The draft Work Plan will be modified as appropriate in response to relevant comments, and all comments and respective responses will be summarized in the final Work Plan.

**F.2.** The variety of notification outlets (website, television, newspaper, the NIC, and direct contact) and media (internet, television, email, direct contact, and published fliers for direct contact and NIC) were chosen to provide written and oral communication to the widest possible number of citizens and accommodate all levels of literacy. This ensures that both the interested general public in Southfield and the organizations and communities most likely to be impacted by the redevelopment plans (i.e. the southeast part of the City) are provided an opportunity to comment on the grant application and Work Plan. Southfield has a negligible population of non-English speaking citizens, making notifications in other languages unnecessary. The City has not received requests or complaints regarding language issues in any previous community involvement program.

**F.3.** Post-award comment periods of at least 30 days will be used for solicitation of input for the Work Plan and any other activity requiring formal public input. Public comment will be encouraged through



community meetings, the City's website, the City's Neighborhood and Information Center, located at the City's municipal building, and through public emails targeted to the affected community.

**F.4.** All public comments received will be reviewed and documented. Applicable and relevant comments will be incorporated into the Work Plan. Written responses to all comments, whether incorporated into the Work Plan or not, will be documented. Final documents will be made available to the public on the City's web site and at City Hall.

### **G. Ongoing Community Involvement**

**G.1.** Community involvement long has been a mainstay of Southfield's governance philosophy. To convert this philosophy into action, Southfield created and maintains a Community Relations Department and Neighborhood Information Center (NIC). These tools will be used extensively and often during the Assessment Grant project as a conduit to provide information about ongoing grant activities to the community, provide announcements of public meetings and comment requests, and generally foster and maintain community involvement and input.

The Community Relations Department's main functions include producing community publications, coordinating community communications, maintaining the content of the City's website, managing media relations, and coordinating special events. The department produces several publications, distributed to every home, apartment, and business in the City. These include *Southfield Living*, the official City newsletter and combined *Parks & Recreation Activities Guide*, and the City's award-winning *Annual Report/Calendar*, featuring a wealth of municipal information. In addition, the department produces the Southfield Business News, Southfield eNews, and numerous other brochures, flyers, and promotional materials.

As part of the Community Relations Department, the City's NIC provides a link between City government and Southfield residents. The NIC is located in the lobby of City Hall. The NIC serves as the clearinghouse for resident complaints and concerns; for example, if a resident has a City-related concern, the NIC directs them to the proper City department for assistance. The NIC serves as the link to existing neighborhood associations, assists in organizing new associations, conducts seminars for the associations, and assists with the publication of neighborhood newsletters. By working with 94 neighborhood associations, the NIC helps to maintain the "curb appeal" and the desirability of the neighborhoods that comprise Southfield. The NIC maintains contact with residents through the quarterly Neighborhood Focus newsletter. The SBRA will work closely with Southfield's NIC to provide relevant project updates, information packets, and solicit continual community feedback.

Ongoing community involvement efforts will also include public meetings of the SBRA (at least quarterly) where project progress will be reported and discussed in an open forum. Efforts also will include outreach to the community and community-based organizations during the Assessment Grant operations period. Organizations such as Southfield's Neighborhood Association will be notified when knowledgeable public officials will be available to participate in meetings of the member organizations. The SBRA will conduct public meetings for these groups, seek input during the site nomination process, and notify specific groups when sites in their area of interest are affected by grant activities. Southfield's Neighborhood Association members' historical knowledge of brownfield sites will be sought. During remediation and redevelopment, the SBRA will seek input from the affected community(ies) regarding planned activities. The SBRA will provide press releases and CATV and website notifications for all public meetings.

**G.2.** At the state level, the SBRA has established a strong and productive partnership with the Michigan Department of Environmental Quality (MDEQ) to help ensure appropriate and sustainable cleanup and development of brownfield sites. These programs will be conducted in compliance with the rules and guidance promulgated by the MDEQ, which define Michigan's VCP program. Partnering with MDEQ district and headquarters staff will be important for acquisition of technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. When tax increment financing (Michigan Brownfields Redevelopment Act; Act 381 of 1996, as amended) is used to reimburse costs of environmental activities associated with brownfields, Work Plans for the environmental response actions are



reviewed and approved by the MDEQ prior to implementation. The MDEQ also reviews and approves the Closure Reports for site where response actions are completed.

At the regional level, Southfield is an active member in the Michigan Suburbs Alliance, a 501(c)(3) nonprofit coalition of southeast Michigan's mature suburbs. The Michigan Suburbs Alliance unites and strengthens metropolitan Detroit's mature suburbs by fostering regional cooperation, reforming public policies, and sharing innovating sustainable redevelopment strategies. In March 2006, the Suburbs Alliance certified Southfield as one of the first "redevelopment ready" communities at a ceremony officiated by Governor Jennifer Granholm. As a redevelopment ready community, Southfield strives for sustainable brownfield redevelopment and receives and shares innovative strategies for sustainable design. Southfield is also a founding member of the 8MBA a non-profit organization whose goal is to revitalize and promote the 8 Mile Road transportation, business and residential corridor by linking the efforts of the public and private sectors.

At the local level, the SBRA will work closely with the City's DDA, the Cornerstone Development Authority, to support of its revitalization efforts in the southeast portion of the City and ensure continued, effective communication with citizens and businesses in the area and promote appropriate and sustainable cleanup and reuse of brownfields. A letter of support from Cornerstone Development Authority for Southfield's Assessment Grant application is provided in Attachment D.

**G.3.** Progress of the overall Assessment Grant project and projects at specific sites will be communicated to the public and relevant community groups using the tools discussed in sections F. and G. above. In all cases, adequate public notice will be provided for all meetings and other outreach programs. Southfield has a negligible population of non-English speaking citizens (see F.2. above), so making notifications in other languages unnecessary. As previously mentioned, written and verbal notifications on radio stations and cable television stations will be utilized to reach both the literate and illiterate members of the community in Southfield.

**G.4.** The following is a list of community-based organizations involved in Southfield's brownfield redevelopment program:

- 1) **Southfield DDA – Cornerstone Development Authority (CDA)** – CDA's mission is to reverse the trend of declining property values and conditions in Southeastern Southfield. Frank Brock, Executive Director, (248)796-5192
- 2) **Southfield Area Chamber of Commerce** – Helping Southfield retain its excellent quality of life and high profile in the global economy is one of the goals of the Southfield Area Chamber Of Commerce. The Southfield Area Chamber plays an active role in a variety of development projects and initiatives. Ed Powers, Executive Director, (248)557-6661
- 3) **Southfield Neighborhood and Information Center (NIC)** –NIC provides a link between City government and Southfield residents. The Center provides relocation information, welcome packets, school information as well as, information about City of Southfield services and programs. Terry Case (248)796-5141

## **H. Reduction of Threats to Human Health and the Environment**

**H.1.** Abandoned and uncharacterized brownfields can pose threats to human health and the environment by allowing uncontrolled access to a contaminated site, while at the same time the public is unaware of contamination and related exposure risks. These threats can be mitigated through site assessments designed to identify the presence of contamination and define its nature and extent, followed by direct remediation and/or redevelopment to reestablish site control through engineering and/or institutional controls.

The State of Michigan and the U.S. EPA have entered into a Memorandum of Understanding (MOU) concerning brownfields redevelopment. The MOU acknowledges the primacy of Michigan's Part 201 VCP program for brownfield sites not on the NPL or subject to a Consent Order. Under Michigan's brownfields VCP program, initial Phase I and Phase II ESA results are used to establish the baseline levels of existing site contamination for which a new owner/developer can obtain an exemption from liability, and to comply

with applicable Bona Fide Prospective Purchaser (BFPP) requirements of All Appropriate Inquiry (AAI); these are major incentives for the acquisition and redevelopment of brownfields and concomitant reduction of threats from contamination. Site assessment results are compared to the VCP risk-based cleanup criteria to determine which exposure pathways must be addressed to protect human health and the environment.

Where exacerbation of contamination may be an issue during development and future use, a VCP “Due Care” obligation to protect human health is placed on all owners of contaminated sites in Michigan. Pre-development environmental response actions, construction activities, and future site use must be designed to satisfy imminent and continuing obligations to protect the health of site users and third parties and prevent exacerbation of contamination. The site development planning process relies on assessment results to identify and design an appropriate combination of environmental response actions, construction procedures, and engineering and institutional controls to satisfy VCP Due Care obligations. Ongoing operations, maintenance, monitoring requirements, and site use restrictions are documented in a Remedial Action Plan or Due Care (environmental response action) Plan as required by the VCP. If known or suspected off-site exposure issues are identified, the VCP requires notification of the MDEQ, which has responsibility for addressing such risks at properties owned by non-labile parties. Off-site health issues also typically involve the local Health Department (see H2 below).

To provide a hypothetical example, assume that at a now empty, unfenced, five-acre urban brownfield targeted for mixed commercial/retail use, the Phase I ESA conducted with Assessment Grant funds revealed the site to have been a foundry. Results of a Phase II ESA, also conducted with Assessment Grant funds, revealed the presence of lead in surface soil at levels above Michigan VCP residential contact criteria and chlorinated solvents in subsurface soil at levels above VCP or intrusion criteria. Since no hazardous substances were to be used on the redeveloped site, this data was sufficient to obtain liability protection under the VCP’s BEA program. This data did not adequately define the extent of contamination to allow design of redevelopment approaches to protect human health during future use; therefore, an additional VCP Due Care (environmental response) investigation was conducted using Assessment Grant funds. Results from this assessment indicated high levels of lead across a large part of the site and a large subsurface area contaminated with chlorinated solvents at levels that would pose a threat to inhabitants of buildings constructed in that part of the site. There was no groundwater at the site. Since the property was in a residential area, the local Health Department and MDEQ were notified and initiated programs to inform residents of the issues, assess lead levels in local yards, and conduct blood lead levels in neighborhood children. The development was configured so that impervious surfaces (building and parking areas) or at least two feet of clean soil covered areas of the property where surficial contamination posed human direct contact threats. The areas of highest chlorinated solvent contamination were excavated and disposed at a licensed landfill. Since part of the new building was to be constructed over these areas, a VCPor barrier and subslab depressurization system were integrated into its construction. To prevent exacerbation of contamination, all excess soil generated during redevelopment was transported for disposal in a licensed landfill. These actions satisfied the VCP Due Care environmental response and AAI BFPP continuing obligation requirements. As a result of using Assessment Grant funds on this site, a significant neighborhood health threat was identified and addressed, threats to human health and the environment posed by contamination on the previously uncontrolled site were mitigated, and the site was safely redeveloped, returning a formally vacant, blighted property to viable, economically productive use.

**H.2.** Compliance with the Michigan’s VCP program, is the primary method for assuring protection of public health and the environment during cleanup and/or redevelopment of brownfields. The VCP guides reuse of contaminated property by statutorily requiring any such use to be protective of human health and to prevent exacerbation of existing contamination. Contaminant-specific, risk-based criteria for protection of human health via direct contact, ingestion, and inhalation pathways are established by rule for residential, commercial, and industrial uses of property. Cleanup criteria for protection of natural resources (e.g. groundwater and surface water) also are established by rule. Substantial guidance documents for implementing assessment and remedial actions under the VCP have been published by the MDEQ. Guidance has been published for selecting and implementing sampling and analysis programs and methods; selection of target analytes; statistical evaluation of data; quality assurance/quality control; preparation of sampling and analysis plans, remedial action plans, and closure reports; and other critical activities and



processes. The VCP also provides guidance for protecting public health and the environment through cleanup or use of institutional and engineering controls, both of which are readily incorporated into redevelopment planning and activities.

New owners of contaminated property can get protection from liability for existing contamination by conducting a baseline environmental assessment (BEA) of the property to identify historic impact and establish a method for distinguishing existing contamination from a new release for which they may be liable. The Assessment Grant is a powerful tool for facilitating this assessment process and subsequent land transfer for redevelopment, because its funds can be used to conduct the BEA and other VCP related documents (i.e., after acquisition, a new owner must prepare and maintain documentation that outlines the steps taken to protect the health of future occupants of and/or workers on the site, including remedial actions where contaminant levels dictate such actions). Response planning funded by the Assessment Grant can help a developer identify and design practical remedial actions and engineering controls for a brownfields redevelopment project.

The Oakland County Health Department (OCHD) is, and will continue to be, involved in environmental health and brownfield redevelopment issues facing communities, including the City of Southfield, within its jurisdiction. If contamination discovered through assessment of brownfields has the potential to negatively impact the health of local populations, especially as related to off-site exposures that would not be the responsibility of a non-labile developer, the MDEQ and OCHD will be notified and brought in as project partners. Based on previous discussions with the OCHD, no disease or symptomatic clusters that would indicate environmental health issues or related target contaminants associated with brownfields have been identified in the City; therefore, the OCHD generally will not be contributing to the site prioritization and initial assessment phases of brownfield redevelopment projects. When contamination is discovered on brownfield sites, the cleanup criteria established by the MDEQ under the VCP will be used to evaluate and address on-site health and environmental threats posed by contamination identified on brownfield sites. The expertise and experience of OCHD will be called upon to help identify/verify offsite health threats posed by identified contamination, identify related toxicological issues and perform risk evaluations, design and conduct notification/education programs, and coordinate health testing (e.g. blood-lead in children near sites, like a foundry, contaminated with lead) if migration of contamination from a brownfield site is confirmed.

The OCHD has been actively involved in education/notification, testing and monitoring, and exposure evaluations related to environmental issues in the county. These are the capabilities that will be contributed to the Assessment Grant team when needed. For example, OCHD has designed and conducted community notification and education programs (meetings, workshops, fact sheets, etc.) about the issues, exposures, and health effects related to indoor air concerns such as lead, radon, and asbestos. In 2006, OCHD held workshops in Southfield on septic systems, including how septic systems are supposed to work and how to detect signs of system failure. The OCHD also designed and implemented testing, monitoring, and/or exposure evaluation programs for environmental health issues in the county. OCHD developed a program to inform citizens about residential lead-based paint issues and provide testing services for lead levels in homes and children. The OCHD's Childhood Lead Poisoning Prevention Program provides evaluation of children's environments and education to families and health-care providers. In addition, OCHD analyzes drinking water samples collected and brought in by citizens. The OCHD's assistance would be employed if assessment results indicate these types of issues and concerns are associated with a brownfield site, particularly when results indicate or demonstrate off-site exposures.

## **I. Leveraging of Additional Resources**

**I.1.** The City has access to the following options for obtaining additional funds to complete site assessments for liability management, risk assessment, and cleanup planning at brownfield sites at which Assessment Grant funds are used:

1. Additional U.S. EPA Assessment Grant – if site risk issues and/or redevelopment schedules permit, the City may apply for additional Assessment Grant funding





2. MDEQ Superfund Section, U.S. EPA Brownfields Redevelopment Assessment Grant (Superfund) – MDEQ staff can perform up to 12 assessments per year on brownfield properties identified by local units of government
3. Developer equity or developer cash repaid with TIF
4. Michigan Brownfield Redevelopment Grants and Loans Program – payment up to \$1,000,000/site for assessments, hazmat abatement, demolition, and environmental response costs at contaminated brownfield sites
5. Michigan Brownfield Redevelopment Tax Increment Financing (TIF; Act 381) Program – reimbursement for reimbursement for costs of assessments, environmental responses, demolition, hazmat abatement, at contaminated brownfield sites
6. City Brownfield Revolving Loan Fund (Michigan TIF program) – payment for assessments, hazmat abatement, demolition, environmental response costs, infrastructure, and site preparation costs
7. City General/Bond Funds – Budgeted general funds or bond proceeds (general, or site specific secured by TIF) may be used for assessments, hazmat abatement, demolition, environmental response costs, infrastructure, and site preparation costs at designated brownfields
8. Community Development Block Grant Funds (Federal Department of Housing and Urban Development funds aimed at supporting low to moderate income residents), the EDC fund, the DDA fund, and the Parks and Recreation dedicated millage.

Oakland County has received, and is actively managing, a Brownfield Revolving Loan Fund Grant to facilitate the cleanup and redevelopment of local brownfields in order to protect natural resources, create jobs in distressed communities, and assist in low-to-moderate income housing development. As an Oakland County community, Southfield can supplement the City's brownfields redevelopment program by leveraging against the County's existing RLF Grant program. The combination of Southfield's Assessment Grant dollars and the County's cleanup grant dollars will allow Southfield to create a very strong and attractive brownfield redevelopment program.

Southfield can also access Oakland County's Planning and Economic Development Department, which provides a wide range of services, including capital asset financing through the County's Local Development Company and SBA 504 loan program.

**I.2.** In order to successfully redevelop a brownfield site where Assessment Grant funds are used, additional funds for the following activities likely will be needed to "balance the playing field" between costs for the brownfield site and an undeveloped, greenfield site: environmental risk management (cleanup and/or engineering controls), asbestos/lead abatement, demolition, infrastructure improvements, and site preparation needed to address issues related to previous uses. The Michigan brownfields redevelopment economic "toolbox" that can be tapped for leveraging Assessment Grant dollars to fill redevelopment funding gaps includes source numbers 3. through 8. listed in I.1, plus the following additional sources:

1. U.S. EPA Brownfields Cleanup Grant – up to \$200,000 per site for grantee-owned property
2. U.S. EPA Brownfields Revolving Loan Fund Grant – up to \$1,000,000 to fund a community Brownfields Loan Fund to finance environmental response actions. Loans from the fund can serve as bridge financing for response actions at favorable rates, to be repaid through TIF or by the developer.
3. Foundations and Non-profit Organizations – Friends of John Grace and other organizations that may be a source of funds for specific types of site, such as greenspace preservation and parks/recreation creation.
4. Other leveraged sources of funds for offsetting additional costs of brownfields redevelopment – Community Development Block Grants (CDBG), Michigan Business Tax Credits (10% of investment), New Market Tax Credits, Michigan Industrial Development Tax Abatement, Michigan Local/State Property Tax Abatement



## **J. Programmatic Capability**

**J.1.** The SBRA is just beginning to build a brownfields redevelopment program, which is one of the primary reasons it is applying for an Assessment Grant at this time. The City plans to use the Assessment Grant to build the foundation of its brownfields program by developing an inventory of sites within the City, gaining experience performing initial assessments and response planning, and developing the management “infrastructure” and experience needed to support future, more aggressive brownfields programs. That will allow the City to undertake and/or support larger and more comprehensive brownfields assessment and site preparation activities to prepare sites for redevelopment. These larger projects typically require leveraging and management of larger and more sophisticated federal and state brownfields financing programs.

Mr. Keith Salo, City of Southfield Brownfields Program Manager, will manage the program for the City. Mr. Salo will be responsible for identifying and assigning staff for the brownfields inventory and community outreach tasks and managing the financial, administrative, and reporting functions of the grant program. Southfield intends to retain an environmental consultant to assist in managing the activities funded by the Assessment Grant and conduct the environmental assessment tasks. The selected consultant will have demonstrated extensive experience with, and understanding of, the Michigan VCP program, the U.S. EPA Assessment Grant program, and the various other state and federal brownfields programs from which funds can be leveraged to facilitate successful brownfields redevelopment projects.

**J.2.** As the recipient of grants from state and other federal agencies, The City of Southfield is experienced in all aspects of administering and managing grant funds. The City has received approximately \$400,000 to \$500,000 in U.S. Department of Housing and Urban Development Community Development Block Grants (CDBG) since the program’s inception in 1974. The CDBG dollars help Southfield develop a viable urban community by providing affordable housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The City of Southfield has also received \$3 to 4 million per year from various major federal and state grant programs to carry out a wide array of projects, including safety, senior transportation, reconstruction, and streetscapes. Southfield’s experience managing federal and state funds has laid the groundwork for management of future federal funds. Southfield has appropriate accounting procedures and internal controls in place to assure accuracy and reliability of data. The City of Southfield has not received any adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, tribal, or local government inspector or similar organization.

**J.3.** The City of Southfield has not been a previous recipient of an EPA Brownfields cooperative agreement.

**J.4.** The City will track the progress of the use of the Assessment Grant funds using both qualitative and quantitative indicators. First, the City will evaluate project achievements against those incorporated into the grant application and Work Plan. Second, the City will determine if the project has resulted in an improved functioning of the SBRA, i.e. successful management, acquisition, and leveraging of brownfields financial incentives. Third, the City and SBRA will document the following project elements determine if each element meets their collective goals:

- |   |  |
|---|--|
| ○ Number of sites assessed                        | ○ Number of sites redeveloped.                                 |
| ○ Number of sites identified with off-site risks. | ○ Redevelopment investment value.                              |
| ○ Number of response actions at identified sites. | ○ New jobs and tax revenue generated.                          |
| ○ Number of title transfers facilitated           | ○ Additional acres of parks and green space created/preserved. |

